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ONE HUNDRED NINTH CONGRESS

# Congress of the United States

## House of Representatives

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INDEPENDENT

## MEMORANDUM

To: Members of the Subcommittee on National Security, Emerging  
Threats, and International Relations

From: Christopher Shays  
Chairman

Date: April 7, 2005

Subject: Briefing memo for April 12th Subcommittee hearing

Attached find the briefing memo required by Committee rules for the hearing on Tuesday, April 12, 2005 entitled, *The UN Oil-for-Food Program: The Inevitable Failure of UN Sanctions*. The hearing will convene at 11:00 a.m. in room 2247 Rayburn House Office Building.

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BERNARD SANDERS, VERMONT,  
INDEPENDENT

April 7, 2004

## MEMORANDUM

To: Members of the Subcommittee on National Security, Emerging Threats, and International Relations

From: Thomas Costa, Professional Staff 

Re: Briefing memo for the hearing *The UN Oil-for-Food Program: The Inevitable Failure of UN Sanctions* scheduled for Tuesday, April 12, 2005 at 11:00 a.m. in room 2247 Rayburn House Office Building.

## PURPOSE OF THE HEARING

To examine United Nations Security Council management of the Iraq sanctions and Oil-for-Food Program and the implications of the failure to maintain the integrity of the sanctions regime.

## HEARING ISSUES

1. To what extent did Security Council and 661 Committee management of the Iraq sanctions regime and Oil-for-Food Program contribute to exploitation and corruption of the programs?
2. What are the implications for current and future UN sanctions regimes?

## BACKGROUND

According to the Congressional Research Service (CRS):

The “oil-for-food” program (OFFP) was the centerpiece of a long-standing U.N. Security Council effort to alleviate human suffering in Iraq while maintaining key elements of the 1991 Gulf war-related sanctions regime. In order to ensure that Iraq remained contained and that only humanitarian needs were served by the program, the program imposed controls on Iraqi oil exports and humanitarian imports. All Iraqi oil revenues legally earned under the program were held in a U.N.-controlled escrow account and were not accessible to the regime of Saddam Hussein.

The program was in operation from December 1996 until March 2003. Observers generally agree that the program substantially eased, but did not eliminate, human suffering in Iraq. Concerns about the program’s early difficulties prompted criticism of the United States; critics asserted that the U.S. strategy was to maintain sanctions on Iraq indefinitely as a means of weakening Saddam Hussein’s grip on power. At the same time, growing regional and international sympathy for the Iraqi people resulted in a pronounced relaxation of regional enforcement — or even open defiance — of the Iraq sanctions. The United States and other members of the United Nations Security Council were aware of billions of dollars in oil sales by Iraq to its neighbors in violation of the U.N. sanctions regime and outside of the OFFP, but did not take action to punish states engaged in illicit oil trading with Saddam Hussein’s regime. Successive Administrations issued annual waivers to Congress exempting Turkey and Jordan from unilateral U.S. sanctions for their violations of the U.N. oil embargo on Iraq. Until 2002, the United States argued that continued U.N. sanctions were critical to preventing Iraq from acquiring equipment that could be used to reconstitute banned weapons of mass destruction (WMD) programs. In 2002, the Bush Administration asserted that sanctions were not sufficient to contain a mounting threat from Saddam Hussein’s regime and the Administration decided that the military overthrow of that regime had become necessary.

The program terminated following the fall of Saddam Hussein’s regime, the assumption of sovereignty by an interim Iraqi government on June 28, 2004, and the lifting of Saddam-era U.N. sanctions. However, since the fall of the regime, there have been new allegations of mismanagement and abuse of the program, including allegations that Saddam Hussein’s regime manipulated the program to influence U.N. officials, contractors, and politicians and businessmen in numerous countries. New attention also has been focused on Iraq’s oil sales to neighboring countries outside the control or monitoring of the U.N. OFFP. Several investigations have revealed evidence of corruption and mismanagement on the part of some U.N. officials and contractors involved with the OFFP, and called into question the lack of action on the part of U.N. Sanctions Committee members, including the United States, to halt Iraq’s profitable oil sales outside of the program over a ten year period.  
**(Web Resource 1)**

As a result of Iraq's August 1990 invasion of Kuwait, and the United Nations (UN) imposed sanctions against Iraq. (**Web Resource 2 and Attachment 1**) Security Council Resolution 661 prohibited all nations from buying and selling Iraqi commodities, except for food and medicine. Resolution 661 also prohibited all nations from exporting weapons or military equipment to Iraq and established a sanctions committee to monitor compliance and progress in implementing the sanctions. Membership on the sanctions committee, known as the "661 Committee," was the same as the Security Council, which includes the United States. Subsequent Security Council resolutions specifically prohibited nations from exporting to Iraq items that could be used to build chemical, biological, or nuclear weapons. (**Web Resources 3 and 4**)

In 1991, the Security Council made several offers to let Iraq sell oil under UN supervision in order to meet basic human needs. The Iraqi government rejected the offers, and over the next 5 years, the UN reported food shortages and a general deterioration in social welfare. (**Web Resource 3**) These shortages led to increased media attention and public pressure to avert a pending humanitarian crisis.

In April 1995, the UN Oil-for-Food Program (OFFP) was authorized by Security Council Resolution 986. (**Web Resource 5**) Over the next several months, bowing to continued Iraqi intransigence, the UN conceded major aspects of control over OFFP to Iraq. In December 1996, OFFP commenced. The program permitted Iraq to sell up to \$1 billion worth of oil every 90 days to pay for food, medicine, and humanitarian goods. This level of sovereign control gave the Hussein regime the power to determine, with certain exclusions, both to whom to sell oil and from whom to buy needed goods. The 661 Committee, however, had veto authority over all contracts. (**Web Resources 3 and 6**)

The objectives, according to the Department of State, were "to address the humanitarian needs of the Iraqi civilian population" and "to continue constraining Saddam Hussein's ability to use oil revenue to build a military arsenal." (**Web Resource 6**)

Subsequent UN resolutions increased the amount of oil that could be sold and expanded the range of goods that could be imported. In 1999, the Security Council removed all restrictions on the amount of oil Iraq could sell to purchase civilian goods. (**Web Resource 3**)

The UN and the Security Council monitored and screened contracts the Iraqi government signed with commodity suppliers and oil purchasers, and Iraq's oil revenue was placed in UN-controlled escrow accounts. (**Web Resource 3**)

In May 2003, UN resolution 1483 requested the UN Secretary General transfer the OFFP to the Coalition Provisional Authority (CPA) by November 2003. Surplus funds in the UN escrow account, as well as new funds from the sale of oil, were subsequently transferred to the CPA-run Development Fund for Iraq (DFI). (**Web Resources 3 and 6**) The UN Controller reported the transfer of \$8.1 billion from the UN account to DFI. (**Web Resource 7**)

OFFP appears to have eased a humanitarian crisis in Iraq. Nevertheless, Iraq found several ways around the sanctions and OFFP. Iraq signed several illicit trade protocol agreements in violations of the sanctions with Jordan, Turkey, Syria, and Egypt, all of which were known to the UN Security Council, including the United States. The Hussein regime also engaged in illegal oil smuggling primarily through the Persian Gulf. In addition, there also have been several allegations of OFFP corruption that have generally fallen into two categories: (1) mismanagement of contracts and administration of the program by contractors and UN personnel; and (2) abuse of the UN program through surcharges on oil exports and kickbacks on humanitarian contracts by the Hussein regime. (**Web Resource 1**)

GAO, the Iraq Survey Group headed up by weapons inspector Charles Duelfer, and the Coalition for International Justice, all estimate Iraq garnered \$9.5 to \$11 billion in illicit revenue during the sanctions period, though estimates of amounts attributable to the trade protocols and smuggling versus OFFP corruption vary widely. The Independent Inquiry Committee has suggested the Iraq Survey Group numbers are the most credible, with estimates of \$9.2 billion from illegal trade protocols and smuggling<sup>1</sup> and \$1.7 billion from surcharges and kickbacks on OFFP transactions. (**Web Resource 9**)

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<sup>1</sup> According to U.S. government officials and oil industry experts, Iraq smuggled oil past the sanctions regime through several routes, often under the rubric of "trade protocols." These protocols were signed official agreements with Jordan, Turkey, and Syria to purchase Iraqi oil outside of OFFP and avoid sanctions. The proceeds from the resale of the oil were split into a cash and a trade account. Cash account monies were deposited through front companies in banks in Jordan and Lebanon. Trade account monies were used to purchase goods from the "trade protocol" partners. (**Web Resources 3, 6, and 8**)

*The UN Oil-for-Food Program: The Inevitable Failure of UN Sanctions* is the Subcommittee's third hearing on the Oil-for-Food Program (OFFP).

The first Subcommittee hearing, *The Iraq Oil-for-Food Program: Starving for Accountability*<sup>2</sup>, was held on April 21, 2004 and addressed how the Hussein regime manipulated OFFP. The second hearing, *The U.N. Oil for Food Program: Cash Cow Meets Paper Tiger*<sup>3</sup>, was held on October 5, 2004 and addressed the problems the OFFP contract inspectors faced in dealing with both the Hussein regime and the United Nations (UN).

## DISCUSSION OF HEARING ISSUES

### **1. To what extent did Security Council and 661 Committee management of the Iraq sanctions regime and Oil-for-Food Program contribute to exploitation and corruption of the programs?**

As an alternative to armed conflict, the United Nations sanctions against Iraq were a failure. The sanctions lacked a clear goal as either a coercive or political instrument. Moreover, during the extent of the Iraq sanctions and OFFP, the Security Council and its subsidiary 661 Committee operated in secrecy, acted on the basis of national political and economic interests, and were not held accountable for decisions that undermined the integrity of the program and the UN. The 661 Committee consensus decision-making procedures made legitimate oversight of OFFP and the sanctions practically impossible as any one Member State could stymie inquiries into areas of concern. Sanctions were further

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Oil entered Syria by pipeline, which the Syrians claimed was "being tested," crossed the borders of Jordan and Turkey by truck, and was smuggled through the Persian Gulf by ship. **(Web Resources 3, 6, and 8)**

A number of oil smuggling operations were caught and stopped. The Multinational Maritime Interception Force (MIF) reduced the amount of oil being smuggled along Iran's southern coast by small vessels. Nevertheless, according to the State Department, the former Iraqi government "orchestrated the largest share of non-compliance with the [Security] Council's demands through outright oil smuggling and the procurement of unauthorized goods completely outside the context of the OFFP program." Moreover, oil smuggling increased after 2000, reaching a peak level of \$2 billion in 2002, totaling an estimated \$5.7 billion over the life of the program. **(Web Resource 6)**

<sup>2</sup> The briefing memorandum and testimony for that hearing can be found online at <http://reform.house.gov/NSETIR/Hearings/EventSingle.aspx?EventID=943>.

<sup>3</sup> The briefing memorandum and testimony for that hearing can be found online at <http://reform.house.gov/NSETIR/Hearings/EventSingle.aspx?EventID=1409>.

weakened by the tacit acceptance by many Member States of smuggling to Jordan, Turkey, and Syria. Moreover, as the sanctions persisted, the Hussein regime, rather than weakening, was strengthened as it gained even greater control of the Iraqi economy and found ways to enrich itself through smuggling and corruption of OFFP.

Peter van Walsum, the Dutch chairman of the 661 Committee from 1999-2000 has noted:

Had Iraq opted for compliance [with UNSCOM, the weapons inspection regime put in place by the UN Security Council], it would have returned to normalcy before the end of 1991. Instead, it resorted to a practice of systematic concealment and deception, which caused the inspections and the sanctions to remain in force for much longer than had originally been envisaged.... By 1997... Iraq seemed so emboldened by the growing division in the Security Council—and especially among the permanent five—that it resorted to ever more active obstruction of the work of UNSCOM. (**Attachment 2**)

## **Rationale for Sanctions**

The sanctions regime hit its first significant hurdles in the aftermath of Kuwait's liberation, when its purpose became less clear as either a coercive or punitive regime. Dr. Paul Conlon, former Deputy Secretary of the Iraq Sanctions Committee, in the early half of the 1990s, has noted:

The [Iraq] sanctions were merely amended, not rescinded, while the rationale behind them was now different and related to more ambiguous demands by the sanctioning party (the Council). At the point support for the sanctions rested on a much weaker basis; the issues involved were less relevant to the entire membership.... (**Attachment 3**)

Furthermore, the length of the sanctions regime further exacerbated problems in the rationale behind the sanctions as van Walsum has noted:

Iraq's preoccupation with weapons of mass destruction clearly was the key to everything that was happening to the country. This also applied to the weapons inspections and the sanctions regime. It occurred to me that although these had the same objective, they were perceived quite differently. The UNSCOM weapons inspectors had in fact been rather popular with the media. They had after all provided some entertainment with the cat-and-mouse game they had been engaged in with the Iraqi authorities. The sanctions regime, by contrast, was seen as a cruel and vindictive operation, responsible for all the suffering of the Iraqi people. But then, the sanctions had never been meant to last for more than half a year at most, and if almost a decade later they were still there, it was only because for all

these years the weapons inspectors had been unable to give Iraq a clean bill of health.  
(Attachment 2)

## **Lack of Transparency**

Perhaps, the greatest weakness of OFFP was its lack of transparency. Conlon observed there was:

the fateful penchant of diplomats and the secretariat's staff to far-reaching and even ludicrous degrees of secrecy. The [661] Committee was thus making decision with potentially sensitive conflict-of-interest ramifications behind closed doors, was weakening its own institution memory by failing to keep accurate or coherent records (since it was not accountable to anyone) and making it all the easier to ignore feedback from practice and the warnings of auditors.... [Delegates and civil servants] operated under the assumption that no-one on the outside would ever know what went on or hold them to account for what they were doing.... Practices and habits of this kind were later carried over into the oil-for-food program (OFFP). (Attachment 3)

Furthermore, most transactions involving the program were done behind closed doors or sometimes illicitly. There was no good reason for most of these transactions to have been done secretly or to remain so. The list of oil purchasers was not known. The list of humanitarian providers was not known. Internal audits performed by the UN were not released and continue to be withheld from both Member States of the UN as well as the public. The public did not know how or with whom Saddam did business, and it did not know how or how effectively the UN monitored those dealings.

## **Acting in National Interest**

As the program developed, it became increasingly apparent to some that the Russians and Chinese, as well as other nations, had much to gain from maintaining the status quo. Their businesses made billions of dollars through their involvement with the Hussein regime and OFFP. Moreover, many of those business interests have been tied to senior officials in those and other governments – those listed on the *Al-Mada*<sup>4</sup> list include many of the largest political parties in Russia (**Web Resource 10**). If these allegations prove true, it is not only plausible, but likely business interests motivated or influenced the behavior of their governments.

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<sup>4</sup> *Al-Mada* was the independent Iraqi newspaper that received a government leak and broke the OFFP scandal story in February 2004. There story included a list of those Saddam allegedly rewarded with vouchers for oil. The list included many prominent world figures. (**Web Resource 10**)



## **Conflict within the Council**

In late 1997, France, which had been a strong ally of the US and United Kingdom on the 661 Committee, began to vote with Russia and China when it abstained with Russia and China on Resolution 1134 condemning Iraq for its obstruction of UNSCOM. Consequently, “the divide that ran through the permanent five, separating France, Russia, and China from the United States and the United Kingdom, became a permanent feature of the Security Council’s business with Iraq.” (**Attachment 2**)

Van Walsum also noted further difficulty in the relationship between the United States and France:

In the sanctions committee France would consistently outshine Russia and China in criticizing the way the United States applied the sanctions regime. It almost looked as though France was engaged in a competition with Russia to be recognized as Iraq’s most devoted friend, with France simply having to work harder as a former member of the Gulf War coalition.... I could not help feeling that more profoundly political considerations, involving its self-image were at play. (**Attachment 2**)

According to van Walsum, Ambassador Hasmy Agam of Malaysia, who also sat on the 661 Committee, “once said that the humanitarian consequences of the sanctions regime were so unacceptable that the risk of proliferation would have to be put up with,” though he also reportedly looked for practical solutions. (**Attachment 2**) This was clearly a view antithetical to that of the United States, but nevertheless demonstrates the 661 Committee had become divided, at war with itself.

The complete set of 661 Committee summary meeting minutes, which have been reviewed by Subcommittee staff, remain classified by the Department of State as Confidential<sup>5</sup> and cannot be distributed outside the Committee. However, the Subcommittee obtained copies of minutes for the first 120 meetings<sup>6</sup>, dated from August 1990 to January 1995, publicly available at the University of Iowa. These papers were placed in the public domain by Dr. Paul Conlon, who worked on the

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<sup>5</sup> Executive Order 12958 (as amended by Executive Order 13292 on March 25, 2003) provides for the US classification of foreign government information (provided on a non-public basis) “under standards that provide a degree of protection at least equivalent to that required by the... international organization of governments that furnished the information.” The UN classified the 661 Committee summary meeting minutes as “UN Restricted”. (**Attachment 5**)

<sup>6</sup> The 661 Committee met officially 244 times between August 9, 1990 and January 22, 2003. Meeting 118, however, was not among the Conlon papers.

661 Committee from 1990 to 1995 as background for his book, *United Nations Sanctions Management: A Case Study of the Iraq Sanctions Committee, 1990-1994* (ISBN 1-57105-059-0).

The minutes, and discussions with former 661 Committee representatives and staff, reveal the Cubans, Yemeni, Russians, Chinese, Syrians, French (in later years), and others consistently refused to support the US and United Kingdom efforts to maintain the integrity of OFFP. In particular, the minutes portray many of those Member States continually arguing to relax sanctions or not properly inspect goods going into Iraq. As questions and concerns arose during Committee meetings, it is Saddam who was given the benefit of the doubt.

For example in the meeting of April 19, 1991 (#37), the Hussein regime requested the Security Council make an exception to allow the export of oil. While other 661 Committee Members noted that more information was needed from the Iraqis before considering the request, the Yemeni representative argued strongly the Committee did not need details from Iraq, which were beyond the scope of the Committee and would only complicate the matter. (**Attachment 6**)

Eventually, van Walsum noted, “It became clearer by the day, however, that the [amended] sanctions regime alone, now based on a resolution adopted with four abstentions, simply was not potent enough to generate the pressure needed to contain Iraq.” (**Attachment 2**)

## **Conflict with the Council and the UN**

Conflict within the Council was not the only internal battle the Council waged. The UN had always been a neutral institution. Sanctions, particularly in the case of Iraq once it had been forced from Kuwait, were seen as taking sides by many UN bureaucrats.

Now for the first time in forty years (since the Korean action of 1950) the UN was legally committed to strict enforcement of its demands and this caused considerable culture shock for large parts of the UN system’s staff. Because of the Council’s isolation from other Charter organs and because the UN system is decentralized, some parts of the system acted as if they would do best to maintain their neutrality in what they saw as a dispute between the Council and one member state.... When in later years the option of military action appeared to have been eliminated, major parts of the UN system then turned against the sanctions. (**Attachment 3**)

In addition, as Secretary-General Boutros Boutros-Ghali

gradually fell out with the western permanent members of the Council he began to turn against their entire agenda, including sanctions.... Other sections of the UN system, particularly those active in Iraq and/or generally having a humanitarian vocation became less cooperative to the Council and began to work against it in regard to sanctions regimes.... (**Attachment 3**)

### **Lack of Accountability**

And within this mix of secrecy, backroom fighting, and dwindling authority, a lack of accountability should have been expected.

“Any delegation that suspected that goods Iraq ostensibly wished to import for peaceful purposes could also be used for the manufacture of weapons of mass destruction could place a hold on the contract in question pending further investigation. In fact, every delegation was expected to do so, but in practice only the United States, and to a lesser extent the United Kingdom, actively discharged that duty. Other delegations were either lukewarm about the sanctions regime or did not see much point in applying their limited resources to a job that would be done anyway—and so much more thoroughly—by the United States. (**Attachment 2**)

This lack of accountability was exacerbated by the adoption of the consensus rule. According to van Walsum:

... in a sanctions committee the permanent members are even more dominant than in the Security Council.

This is partly due to the absence of a decisionmaking machinery. Nothing gives the nonpermanent members of the Security Council more power than the rule that a resolution needs nine positive votes to be adopted. It is a very modest compensation for the blocking power held by each permanent member.... In the Council, a unanimous view is often reached under the threat of a vote. In a sanctions committee there is nothing of the sort. Decisions are taken on the basis of consensus. If there is no consensus, there is no decision. One might also put it this way: on a sanctions committee all fifteen members have the right of veto. A little bit of arithmetic teaches us that the sanctions committee must be about three times as inflexible and irresolute as the Security Council itself. (**Attachment 2**)

### **Acceptance of Smuggling**

As noted earlier, the Security Council was aware of the trade protocols with Jordan, Turkey, Syria, and Egypt and did little to stop it, and even accepted them. However, as Conlon has pointed out:

Most of the sanctions resolutions of the [UN Security] Council in the 1990s were adopted by near-unanimous majorities yet the subsidiary organs created by the same resolutions spent much of their time obstructing or even undoing the objectives of the Council resolutions under which they were created. The 1991 decision of the Iraq Sanctions Committee... to tolerate exports of oil from Iraq to Jordan was a unique and bizarre instance of a subsidiary organ violating the provisions of a superordinate legislative instrument of its own parent body; even more bizarre is the fact that both bodies had the exactly same membership. (**Attachment 3**)

And in the end, as van Walsum stated, “It was even conceivable that the oil-for-food program, with its centralized delivery mechanism, was supplying Saddam Hussein with a welcome instrument for exercising total control over his people,” a charge that in retrospect appears increasingly true. (**Attachment 2**)

## **2. What are the implications for current and future UN sanctions regimes?**

Future sanctions can take many lessons from the failings of the Iraq sanctions regimes and OFFP, including the obvious need for clear, finite goals, transparency, and enforcement.

### **Sanctions must have a clear, finite goal.**

In the aftermath of Kuwait’s liberation, sanctions on the Hussein regime lost much of their focus. The UN was not in the habit of punishing dictators because they treated their own population poorly, but this, in addition to disarmament, increasingly became a reason for the sanctions.

In addition, time is the enemy of all sanctions regimes. Sanctions fatigue affects nations and businesses as many begin working their way around sanctions. On the other hand, the sanctioned regime, playing off the corrupt and the fatigued, inevitably finds its way around the sanction’s effects even while its population suffers. In time, the sanctions are no longer effective and at least in the case of Iraq, empower the sanctioned dictator.

### **Sanctions must be transparent.**

A lack of transparency throughout the program was critical to its failure. The Security Council operated behind closed doors, the 661 Committee operated behind closed doors, as did the UN Secretariat, the Member States, and the

businesses that dealt with Iraq. It is critical the UN seize OFFP as an opportunity to increase systemic transparency of that critical organization.

### **Sanctions must be enforced**

The acceptance of trade protocols between Iraq and its neighbors should have been seen as the unacceptable avenue to corruption and empowering Saddam that it was.

Furthermore, in the wake of long-standing sanctions, OFFP essentially became the “un-sanctions” regime, and it was run by Saddam. The Iraqis were able to determine with whom they did business. That allowed Saddam to set up a kickback scheme in which only those willing to participate in some form of kickback were allowed to participate, whether on the oil sales side of the program or the humanitarian goods purchases side. According to the State Department, while Saddam gleaned kickbacks early on in the program, “the regime first began to insist on ‘kickbacks’ beginning with phase 8 of OFF in June 2000.” (**Web Resource 11**) OFFP became a reliable and substantial cash cow for Saddam.

As former UN Director of Strategic Planning Andrew Mack has commented:

... there is a broad agreement that sanctions should be seen as a tool of policy, not a substitute for it. To be effective, a sanctions regime must be guided by a coherent and comprehensive political strategy, one that seeks broad international support for the regime and minimization of the human costs it will inevitably incur. Such regimes should be implemented, monitored, and assessed with the aid of highly professional staff, while consideration should be given to the selective use of inducements as well as coercion. Unfortunately, these simple requirements are almost never met in practice. (**Attachment 4**)

## **WITNESSES**

### **PANEL ONE**

**Mr. Thomas A. Schweich**

Chief of Staff

U.S. Mission to the United Nations

U.S. Department of State

### **PANEL TWO**

**Dr. Paul Conlon**

Owner, Transjuris e.K. (Munich, Germany)

former Deputy Secretary

United National Security Council Iraq Sanctions Committee

**Mr. Andrew Mack**

Director, Centre for Human Security

University of British Columbia (Canada)

former Director of Strategic Planning

Executive Office of United Nations Secretary-General Kofi Annan

**Dr. Joy C. Gordon**

Associate Professor of Philosophy

Fairfield University

## **WITNESS TESTIMONY**

Witnesses were told purpose of the hearing is to examine UN Security Council management of the Iraq sanctions and OFF program and the implications of UN failure to maintain the integrity of the sanctions regime. Witnesses were asked to provide their views.

Mr. Schweich, the State Department witness, was also asked to address: (1) the Department view of the Iraq sanctions in retrospect; (2) the Department view of how the 661 Committee functioned; (3) the Department view of how possible future sanctions regimes might work; and (4) the status of ongoing Department efforts to review and declassify US government reporting of the Iraq sanctions and OFF.

Dr. Conlon has been critical of the running of the Iraq sanctions since his departure from the United Nations in 1995.

Mr. Mack and Dr. Gordon have written extensively about the United Nations and sanctions. Both have taken a constructive view of the United Nations.

## WEB RESOURCES

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2. UN Chronology of the Oil-for-Food Programme, <http://www.un.org/Depts/oip/background/chron.html>.
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